
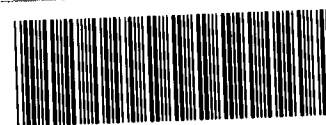


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 GENERAL CONTACT REPORT	Date Time <10/24/97>	Name / Organization RECEIVED OPPT NCIC Chemical Control Division / Chemical Testing & Information Branch 97 DEC 23 AM 9:11
Name of EPA Rep. <input type="checkbox"/> Check if Contact Initiator Richard Leukroth	Type of Contact <input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Meeting	
Name of MFG / Org Rep. <input checked="" type="checkbox"/> Check if Contact Initiator <Fred Johannsen 314/674-8815 Solutia, Inc.>	<input type="checkbox"/> Other	
Topic Covered: Note any resolutions and/or additional Actions Required on this Form.		
<p>< Q. I am preparing for a talk to the ISX meeting and would like to discuss the use of PK in section 4 test rules.</p> <p>A. I preceded my comments by referring him to both Annie Jarabek and Charles Auer who, I explained, may have different opinions from mine. I explained that we had received 8 proposals and that we are optimistic about the use of PBPk as a means to defer some or all of the HAPs test requirements depending on the outcome of the individual ECA processes. I further explained that, at this time, it is difficult to predict just how this will fit into the section 4 process because this is our first time out. At question is whether or not the PK studies will provide sufficient information to allow the route-to-route extrapolation and then the adequacy of the available database for each chemical. Some will be easier than others and that each case provided its own unique challenges in that some had difficulties due to physical properties while the existing database for others was old and relied on studies that could be called into question. In addition, the Agency notes that the celebre of the proposals varied. Some whet into detail about how the proposed PK would be used to meet HAP proposed testing requirements while others did not. We both noted that, at this time, there was no Agency guideline about how to apply PK. I emphasized that this is a learn by doing process and we just have to give it some time to work out the details.</p> <p>I suggested that he obtain copies of the proposals and the Agencies preliminary technical responses from the docket. I gave him a contact at the docket who would be able to help him. I explained that our current thinking is to begin ECA process public meeting in January / February 1998. ></p>		
KEY WORDS : <HAP, PK>		
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